

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

NO. 04-10231 (MLW)

SEAN SACCO

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DEFENDANT'S MOTION FOR LEAVE TO TRAVEL OUTSIDE THE DISTRICT

Now comes the Defendant, Sean Sacco, in the above-captioned matter, and moves this Court to allow him to travel outside the District of Massachusetts to Toronto, Canada from Friday April 21, 2006 until Sunday April 23, 2006.

The purpose of the defendant's trip is to attend two baseball games between the Toronto Blue Jays and Boston Red Sox on Friday April 21, 2006 at 7:00 p.m. and Saturday April 22, 2006 at 1:00 p.m. with his friends.

While in Toronto, the defendant plans to stay at the Cambridge Suites Hotel located at 15 Richmond Street, East Toronto, ON M5C 1N2. The hotel telephone number is 416 – 368 – 1990. The defendant's hotel reservation confirmation number is R18FF.32.2.1.

The defendant plans to travel to Toronto will be in the company of the following individuals:

Gregory Moakley  
12 Jordan Road  
Peabody, MA

Matthew Metzmaker  
3 Uncatena Avenue  
Worcester, MA

Scott Marino  
20 Meade Avenue, Unit #2

Patrick Morrison  
246 Fairmont Avenue

Hull, MA

Ned Babyak  
26 Timber Lane  
Holden, MA

Hyde Park, MA

Sean Cusson  
26 Timber Lane  
Holden, MA

The defendant and his companions intend to travel by car.

The defendant has advised the government of his intended travel plans. The government has advised that it assents to the motion so long as US Pretrial Services concurs in the proposed travel arrangements.

Respectfully submitted,

/S/ William M. White, Jr.  
WILLIAM M. WHITE, JR.  
BBO#: 546283  
Davis Robinson and White, LLP  
1 Faneuil Hall Marketplace, 3<sup>rd</sup> Floor  
Boston, MA 02109  
(617) 723-7339

Dated: April 10, 2006

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CERTIFICATE OF SERVICE

I, William M. White, Jr., hereby certify that on this April 10, 2006, I have served a true copy of the above Defendant's Motion to Travel Outside the District upon the United States, Assistant United States Attorney Victor Wild, which was e-filed this day.

/s/ William M. White, Jr. \_\_\_\_\_  
WILLIAM M. WHITE, JR.  
BBO#: 546283  
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Boston, MA 02109  
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DATE: April 10, 2006